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J. PIERSON

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24 Q. Who employed you in connection with

25 the Defendants here today?

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2 A. I'm a contractor with Rare Breed
3 Triggers.

4 Q. And what does that mean, that you're
5 a contractor with Rare Breed Triggers?

6 A. It means that I work on my own
7 schedule. I work from where ever I want to
8 work. I can take another job on the side, if
9 I want. I don't have, like, an office that I
10 go to there and work set hours for them.

11 Q. And you say contractor, were you
12 placed in your position with Rare Breed
13 Triggers by an employment agency?

14 A. No.

15 Q. When did you first start working
16 with Rare Breed Triggers?

17 A. I think it was January of 2021.

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21 Q. No, I understand. I just want to
22 understand if your conversation with Mr.
23 Leleux and Mr. DeMonico touched on the
24 businesses, RBT, RBF?

25 A. No. It was very -- we spoke about

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2 the deposition and it was very just broad
3 level. Because I had never done a deposition
4 before, so it was just tell the truth. They
5 probably said that, like, that's the most
6 important thing you can do, is just tell the
7 truth. And it was just that very broad level
8 quick conversation.

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9 Q. So when you started working for RBT,
10 who told you what your duties would be?

11 A. Lawrence.

12 Q. And what did he tell you?

13 A. That I was going to be doing
14 customer service.

15 Q. Now, you mentioned an e-mail
16 account,

17 customerservice@rarebreedtriggers.com, is
18 that right?

19 A. Yes.

20 Q. And you received and responded to
21 e-mails addressed to this account?

22 A. Yes.

23 Q. Was there a phone number that
24 individuals could contact you in addition to
25 this e-mail?

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2 A. No.

3 Q. Now, other than this e-mail account,
4 did you have responsibility to another e-mail
5 account for Rare Breed Triggers?

6 A. When I first started, I had access
7 to admin@rarebreedtriggers because that was
8 the only e-mail account at the time. And
9 then, I believe, we setup -- I think Lawrence
10 and I worked together to setup the customer
11 service e-mail. I mean, it was very quickly
12 within, you know, the first -- I don't know
13 -- first week or two of me working there, but
14 there was a time when I had access to the
15 admin e-mail when I first started.

16 Q. So did there come a time when you
17 did not have access to the
18 admin@rarebreedtriggers.com account?

19 A. Correct.

20 Q. You were blocked or you just didn't?

21 A. No. It wasn't my account. I had
22 access to it. I don't think I was blocked
23 I only dealt with customer service.

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3 Q. Do you know why RBT had a no refund
4 policy?

5 A. I wasn't involved in that
6 decision-making.

7 Q. But were you ever told why the no
8 refund policy existed in the first instance?

9 A. I know that we gave a response to
10 customers about it. I'm trying to remember
11 exactly what we said. I think -- I'm not
12 sure. It's not something that I questioned.
13 And a no return policy seems pretty standard
14 to me.

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